

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF SOUTH CAROLINA

**FILED**  
2001 SEP 25 AM 12:18  
U.S. BANKRUPTCY COURT  
DISTRICT OF SOUTH CAROLINA  
KLR  
AST

In Re:

William Wilson	)	Bankruptcy Case No. 99-05665-W
SSN: 251-96-0808	)	
	)	
And	)	Chapter 13
Juanita Raye Miller,	)	
SSN: 250-94-8262	)	
Debtors.	)	
	)	

TO: All Creditors and Parties in Interest

**MOTION AND MEMORANDUM IN SUPPORT OF MOTION TO SELL PROPERTY  
FREE AND CLEAR OF LIENS**

YOU ARE HEREBY NOTIFIED that the Debtors proposed to sell the property herein described free and clear of all liens and encumbrances according to the terms and conditions stated below.

TYPE OF SALE: Private

PROPERTY TO BE SOLD: ½ interest in a 1992 Clayton Newport II Mobile Home (56' x 14') - Serial Number CM5153

PRICE: The Debtor, Juanita Raye Miller, has entered into a Sales Agreement, signed September 5, 2001, subject to the approval of this Court, and the potential buyer has agreed to purchase the Property for a total purchase price of Ten Thousand Twelve Dollars and Two Cents (\$10,012.02) see attached Exhibit "A".

APPRAISAL VALUE: According to Schedule B of the Debtors' Petition, see attached Exhibit "B", market value of property is \$13,380.00. (Debtor only possesses a shared ½ interest with Betty Jane Miller, a non-debtor.)

BUYER: Jerry T. Sizemore, Jr., 240 Lamplighter Drive, Greer, SC 29651

PLACE AND TIME OF SALE: Sale of property will be within ten (10) days of the date the order is granted.

SALES AGENT: Luv Homes of Greenville  
2351 North Pleasantburg Drive  
Greenville, SC 29609

COMPENSATION TO SALES AGENT/AUCTIONEER/BROKER/ETC.:

To be paid by the Buyer according to the Contract.

ESTIMATED TRUSTEE'S COMPENSATION: N/A

LIENS/MORTGAGES/SECURITY INTERESTS ENCUMBERING PROPERTY:

From the proceeds of the sale will be paid the following:

1. Lien to Vanderbilt Mortgage  
Approximate Balance: \$10,012.02

COSTS OF CLOSING: Buyer shall be responsible for all closing costs.

DEBTORS' EXEMPTION: \$0.00

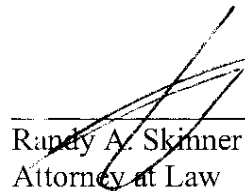
PROCEEDS ESTIMATED TO BE PAID TO ESTATE:

½ of the balance of all proceeds after the costs, expenses,  
and deductions above shall be paid to the Chapter 13  
Trustee toward the debtors' plan of reorganization.

Any party objecting to the sale must do so in writing and in accordance with SC LBR 9014-1; any such objections will be heard at the date, time, and place set forth in the Notice of Motion/Application and Opportunity for Hearing attached hereto. All objections should be filed with the Clerk of Court at 1100 Laurel Street, Post Office Box 1448, Columbia, SC 29202, with a copy served on the attorney of record, the trustee, or the debtor in possession, as applicable, at the address shown below. A copy of the objection should also be served on the United States Trustee of 1201 Main Street, Suite 2440, Columbia, SC 29201.

The court may consider additional offers at the scheduled hearing. The court may order at this hearing that the property be sold to another party on equivalent or more favorable terms.

The trustee or debtor in possession, as applicable, may seek sanctions or other similar relief against any party filing a spurious objection to this notice.



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District Court I.D.#: 5412  
Attorney for Debtors

9/18/, 2001  
Greenville, South Carolina

1. *Chlorophyll a* (Chl *a*)

In re **William NMN Wilson**  
**251-96-0808**

**Juanita Raye Miller**  
**250-94-8262**

Case No.

## SCHEDULE B - PERSONAL PROPERTY

(Continuation Sheet)

TYPE OF PROPERTY	NONE	DESCRIPTION AND LOCATION OF PROPERTY	HUSBAND, WIFE, JOINT OR COMMUNITY	CURRENT MARKET VALUE OF DEBTOR'S INTEREST IN PROPERTY, WITHOUT DEDUCTING ANY SECURED CLAIM OR EXEMPTION
27. Machinery, fixtures, equipment and supplies used in business.	X			
28. Inventory.	X			
29. Animals.	X			
30. Crops - growing or harvested. Give particulars.	X			
31. Farming equipment and implements.	X			
32. Farm supplies, chemicals, and feed.	X			
33. Other personal property of any kind not already listed. Itemize.		<b>1992 Newport Model 60'x14' Clayton Mobile Home located at 240 Lamplighter Drive, Lot #74, Greer, SC 29651</b> <b>COUNTY: Spartanburg</b> <b>SOURCE OF VALUATION: 1998 Tax Appraisal</b>  <b>Vanderbilt Mortgage</b> <b>Mortgage: \$16,000.00</b>	J	<b>13,380.00</b>
		<b>RESIDENCE:</b> <b>1991 Fleetwood 14'x80' Weston model Mobile Home located at 326 White Horse Road Ext., Travelers Rest, SC 29690</b> <b>SOURCE OF VALUATION: 1998 Tax Appraisal</b>  <b>Chase Manhattan Mortgage Corporation</b> <b>Mortgage: \$11,896.14</b>		<b>13,690.00</b>
Total				<b>\$ 86,713.00</b>

*grm*  
*ww*